

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**V.**

**LEONARDO ROBLES-ALEMAN**

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**Criminal No. 4:24-cr-00558**

**STATEMENT REGARDING GOVERNMENT’S APPEAL OF RELEASE ORDER**

The defendant, Leonardo Roble-Aleman (Mr. Aleman), through his counsel, Tom Berg, presents the following argument in support of the magistrate judge’s order for release after a full hearing:

1. Mr. Robles was arrested on August 22, 2023, during an undercover drug operation in the vicinity of Alvin, Texas. After talking with arresting officers and consenting to a search of his home in Alvin, Mr. Robles was released. There were no firearms associated with this case. Although the indictment against him was returned on October 30, 2024, he was not rearrested until January 24, 2025, at his home. During the period between his first and second arrest Mr. Robles returned to supporting his family and working at Divine Telecom Services in Tomball, Texas as a contractual worker. Mr. Robles had been employed there for several years. There was no effort to flee to Mexico or otherwise abscond.

2. Mr. Robles, born in Mexico, entered the United States lawfully around twelve years ago on a visa but is now in an overstay status. His wife, Cythia, is similarly situated but their two-year old child is a United States citizen. He owns their manufactured home and is paying rent on the property in Alvin where it is located. He has no prior criminal

record. During the detention hearing held on January 30, 2025, a family member with a lawful permanent status in the United States agreed to cosign a bond and serve as a third-party custodian. Several other family members also were present in court. Pretrial Services eventually confirmed all of these facts.

3. The government took the position at the hearing that Mr. Robles presents an unacceptable risk of flight and that no conditions can reasonably assure his presence on the charges. The magistrate judge found the presumption of flight rebutted and that substantial conditions were available including a \$120,000 bond.

4. The government gave oral notice of appeal and requested a stay of the release order on January 30, 2025. As of the date of this filing, February 2, 2025, the government has not filed a notice of appeal or a motion to revoke the order of release. Defense counsel has ordered an expedited copy of the transcript of the detention hearing for the benefit of the Court. Meanwhile, Mr. Robles remains in custody.

Respectfully submitted,

/S/Tom Berg

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#### CERTIFICATE OF SERVICE

I certify that a copy of this pleading was served on all parties by ECF this day.

/S/ Tom Berg